

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RICHARD R. FURSTENAU,)	
)	
Plaintiff,)	No. 07 C 6143
)	
v.)	Judge Charles R. Norgle
)	
CITY OF NAPERVILLE, a municipal)	Magistrate Judge Geraldine Soat Brown
Corporation; MICHAEL HULL, in his individual)	
and official capacity; DAVID DIAL, in his)	
official and individual capacity; MICHAEL)	
CROSS; in his individual and official capacity;)	
PETER BURCHARD, in his official and)	
individual capacity; MARGO L. ELY, in her)	
individual and official capacity; and JOE)	
MATCHETT, in his individual an official)	
capacity,)	
)	
Defendants.)	

**DEFENDANT CITY OF NAPERVILLE'S MOTION FOR A PROTECTIVE
ORDER TO STRUCTURE DISCOVERY**

For the reasons set forth in the Memorandum of Law submitted in support of this Motion, Defendant, City of Naperville ("City"), hereby moves for the entry of a protective order to structure discovery in such a way that discovery and depositions on issues that are the subject of pending Motions to Dismiss ("Motions") not be taken until a later date when it can be shown that such depositions will lead to discoverable evidence.

Accordingly, for the reasons set forth in the Memorandum of Law submitted in support of this Motion, Defendant, City of Naperville, respectfully requests this Honorable Court to enter a protective order structuring discovery in this case.

Respectfully submitted,

CITY OF NAPERVILLE,

By: /s/ Terrence J. Sheahan
One of Its Attorneys

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